

Paul H. Beattie, WSBA No. 30277

CKR Law LLP

506 2nd Avenue, 14th Floor

Seattle, WA 98114

Telephone: (415) 297-0132

Facsimile: (206) 582-5001

Email: pbeattie@ckrlaw.com

Attorneys for Mark D. Waldron, Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

Case No. 18-03197 FPC 11

GIGA WATT, Inc., a Washington
corporation,

Chapter 11

Debtor.

**DECLARATION OF WILLIAM R.
FIRTH, III IN SUPPORT OF
MOTION TO ADMIT *PRO HAC*
*VICE***

I, William R. Firth, III, being conscious of the penalties of perjury under Washington State and federal law, declare the following statements to be true and correct and based on my own personal knowledge and information.

I am a partner with CKR Law LLP. I provide the following information in support of the motion for my admission to practice before this Court *pro hac vice*.

A. Applicant's Address and Telephone Number.

William R. Firth, III, Attorney
CKR Law LLP
1000 N. West Street, Suite 1200
Wilmington, Delaware 19801
T: (302) 367-7903

1 E: wfirth@ckrlaw.com

2 **B. Dates of Admission to Practice Before Other Courts.**

3 2002: Admitted to New Jersey Bar
4 Admitted to Pennsylvania Bar
5 U.S. District Court for the District of New Jersey
6 U.S. District Court for the Eastern District of Pennsylvania

7 2003: Admitted to Delaware Bar
8 U.S. District Court for the District of Delaware
9 U.S. Third Circuit Court of Appeals

10 **C. Name, Address and Telephone Number of Admitted Counsel**
11 **With Whom the Applicant Will Be Associated.**

12 Paul H. Beattie, WSBA No. 30277
13 CKR Law LLP
14 506 2nd Avenue, 14th Floor
15 Seattle Washington 98104
16 T: (206) 696-9095
17 E: pbeattie@ckrlaw.com

18 **D. Necessity for Appearance by Applicant**

19 The Chapter 11 Trustee has retained CKR Law LLP ("CKR" to represent him
20 in the above-captioned case. I am a graduate of Villanova University, the
21 University of Pennsylvania and Villanova Law School. I am an experienced
22 bankruptcy litigator and have eighteen years of experience in bankruptcy litigation
23 and insolvency matters. I also have experience investigating and prosecuting civil
24 fraud in the bankruptcy context in general and involving Russian defendants

25 In addition to my significant bankruptcy and Chapter 11 experience, CKR

1 Law also has an extensive bankruptcy and restructuring department, with attorneys
2 experienced in representing Chapter 11 debtors, creditors' committees, secured and
3 unsecured creditors, trustees, asset purchasers and sellers, and other parties in
4 complex bankruptcy and insolvency proceedings in courts across the country.

5 This bankruptcy matter also involves cutting-edge blockchain technology.
6 CKR is particularly well-suited to represent the Chapter 11 Trustee in this Chapter
7 11 case, because CKR has one of the largest and most experienced blockchain
8 practice groups in the United States. CKR's Blockchain Technology & Digital
9 Currency practice group provides clients with sophisticated, value-added legal
10 advice in legal matters involving bankruptcy, real estate, intellectual property,
11 banking, finance, securities, corporate, crowdfunding, investment funds,
12 employment, and litigation. Recently, my partner Alexandra Levin Kramer was
13 named by ICO Alert (a blockchain trade group) as the only practicing attorney in
14 the United States on their list of Top 40 Blockchain Influencers of 2018. CKR's
15 knowledge and experience in blockchain and related issues will allow the Chapter
16 11 Trustee to discharge his duties in this factually and legally-complex Chapter 11
17 proceeding.
18
19

20 **E. Disciplinary Sanctions by Any Court or Bar Association.**

21 I have never been disciplined or sanctioned by any court or bar association.
22
23

1 I understand that I am charged with knowing and complying with all Local
2 Bankruptcy Rules for the Eastern District of Washington and the Local Rules for
3 the United States District Court for the Eastern District of Washington.

4 I hereby declare under penalties of perjury that the foregoing statements are
5 true, accurate, and correct to the best of my knowledge, information, and belief.

6 Signed in New Castle County, Delaware.

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8 Dated: March 21, 2019



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10 William R. Firth, III
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12 Wilmington, DE 19801
13 Telephone: (302) 367-7903
14 Email: wfirth@ckrlaw.com
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